

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:
Christopher Robinson	: Case No.: 18-15282-MDC
Debtor	: Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Christopher Robinson, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about August 9, 2018.
2. The Chapter 13 filing was assigned case number 18-15282-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about August 15, 2019.
4. The Debtor seeks modification of the plan as the proof of claim submitted by Americredit Financial Services, Inc. (hereinafter referred to as "Americredit") does not match the confirmed plan because it was later amended by the creditor.
5. On June 26, 2019, the Court granted Americredit's Motion for Relief from Stay regarding the 2015 Chevrolet Malibu and the creditor obtained relief.
6. The confirmed plan is incorrect as the claim is listed as secured instead of unsecured. Additionally, the plan is a 100% plan and it should be amended to account for the unsecured debt in the amount of \$903.78.
7. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "Exhibit A", is deemed affordable by the Debtor.

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: February 10, 2020

/s/Brad J. Sadek, Esq.

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